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Proposed Attorneys for Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

BLUE EARTH, INC., et al.,¹

Debtors.

Case No.: 16-30296-DM

Chapter 11

Joint Administration Requested

**APPLICATION FOR ORDER
APPROVING DESIGNATION OF G.
ROBERT POWELL AS RESPONSIBLE
INDIVIDUAL PURSUANT TO
BANKRUPTCY LOCAL RULE 4002-1**

[No Hearing Required]

Pursuant to Rule 4002-1 of the Bankruptcy Local Rules for the Northern District of California (the “**Local Rules**”), Blue Earth, Inc. and Blue Earth Tech, Inc., the debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), hereby apply for entry of an order approving the designation of G. Robert Powell as their designated responsible individual during these chapter 11 cases. In support thereof, the Debtors respectfully represent as follows:

1. On March 21, 2016, the Debtors each filed a voluntary petition under chapter 11 of title 11 of the United States Code.

¹ The last four digits of each of the Debtors’ tax identification numbers are Blue Earth, Inc. (1496) and Blue Earth Tech, Inc. (0269). The location of the Debtors’ headquarters and service address is 235 Pine Street, Suite 1100, San Francisco, California 94104.

2. By this application, the Debtors seek to approve the appointment of G. Robert Powell (“**Mr. Powell**”), the Chief Executive Officer of the Debtors, as the designated individual with primary responsibility for the duties and obligations of the Debtors.

3. Mr. Powell’s contact information is:

G. Robert Powell, CEO
Blue Earth, Inc.
235 Pine Street, Suite 1100
San Francisco, CA 94104
Telephone. (415) 964-4411

WHEREFORE, the Debtors respectfully request that this Court enter an order designating Mr. Powell as the natural person to be responsible for the duties and obligations of the Debtors during these chapter 11 cases pursuant to Local Rule 4002-1. A proposed form of order is annexed hereto as **Exhibit A**.

Dated: March 21, 2016

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ John Lucas

Jeffrey N. Pomerantz
Debra I. Grassgreen
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Malhar S. Pagay

Proposed Counsel for Debtors

EXHIBIT A

(Proposed Order)

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

BLUE EARTH, INC., et al.,¹

Debtors.

Case No.: 16-_____

Chapter 11

[Joint Administration Requested]

**ORDER APPROVING DESIGNATION OF
G. ROBERT POWELL AS RESPONSIBLE
INDIVIDUAL PURSUANT TO
BANKRUPTCY LOCAL RULE 4002-1**

The Court having considered the *Application for Order Approving Designation of G Robert Powell as Responsible Individual Pursuant to Bankruptcy Local Rule 4002-1* (the “**Application**”) filed by Blue Earth, Inc. and Blue Earth Tech, Inc., the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), and good cause existing for the relief requested,

IT IS HEREBY ORDERED THAT:

1. The Application is **GRANTED**.

2. G. Robert Powell is appointed as the responsible individual for the Debtors for purposes of these chapter 11 cases pursuant to Bankruptcy Local Rule 4002-1.

*****END OF ORDER*****

¹ The last four digits of each of the Debtors’ tax identification numbers are Blue Earth, Inc. (1496) and Blue Earth Tech, Inc. (0269). The location of the Debtors’ headquarters and service address is 235 Pine Street, Suite 1100, San Francisco, California 94104.